

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL)
OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,))
in his capacity as the)
TRUSTEE FOR NATURAL RESOURCES)
FOR THE STATE OF OKLAHOMA,)

Plaintiff,)

vs.)

4:05-CV-00329-TCK-SAJ

TYSON FOODS, INC., et al,)

Defendants.)

VOLUME I OF THE VIDEOTAPED
DEPOSITION OF ROGER OLSEN, PhD, produced as a
witness on behalf of the Defendants in the above
styled and numbered cause, taken on the 10th day of
September, 2008, in the City of Tulsa, County of
Tulsa, State of Oklahoma, before me, Lisa A.
Steinmeyer, a Certified Shorthand Reporter, duly
certified under and by virtue of the laws of the
State of Oklahoma.

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EXHIBIT

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1 A That's one of the parameters that the EPA
2 uses. The others ones, I've said there, is
3 accurate, precise, representative and comparable,
4 and the last one they use is completeness.

5 Q Dr. Olsen, isn't it true that if Motley Rice's 11:17AM
6 experts simply chose not to reject data, you would
7 necessarily get a high completeness?

8 MR. PAGE: I want to make a standing
9 objection to the Record that you kept on talking
10 about the Motley Rice experts. These experts in 11:17AM
11 this case have been retained by the State of
12 Oklahoma, approved by the State of Oklahoma and
13 Attorney General, therefore. They've been
14 compensated by Motley Rice, but they're not Motley
15 Rice's experts. They're the State of Oklahoma's 11:18AM
16 experts in this case. If I could have that standing
17 objection to your questions that constantly refer to
18 the experts as being Motley Rice's experts, I would
19 appreciate it, Mr. George.

20 MR. GEORGE: I think the Record is clear, 11:18AM
21 but you can have whatever standing objection you
22 like.

23 Q Do you recall my question, Dr. Olsen?

24 A No. If you want to state that again --

25 MR. GEORGE: Lisa, could you read it back?

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